

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

NEIL COLE,

Defendant.

No. 19-cr-00869 (ER)

**NOTICE OF MOTION *IN LIMINE* TO PRECLUDE CROSS-EXAMINATION
AS TO THE CANDIE'S INTERNAL INVESTIGATION,
SEC INVESTIGATION, AND SETTLEMENT**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, defendant Neil Cole will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York, on a date and time to be determined by the Court, for an order granting Mr. Cole's Motion *in Limine* to preclude cross-examination as to the Candie's internal investigation, SEC investigation, and settlement, and for such other relief as the Court may deem just and proper.

Dated: New York, New York
October 3, 2022

/s/ Sean Hecker

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